

UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

United States of America  
v.  
RUSSELL D. ROQUEMORE  
DOB: XX/XX/2002

Case No. 23 MJ 228

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 27, 2023 in the county of Milwaukee in the  
Eastern District of Wisconsin, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 2113(a)

Bank Robbery

This criminal complaint is based on these facts:

Please see attached Affidavit.

☒ Continued on the attached sheet.



Complainant's signature

Martin Keck, Task Force Officer, FBI

Printed name and title

Sworn via telephone; transmitted via email  
pursuant to Fed. R. Crim. 4.1

Date: \_\_\_\_\_



Judge's signature

City and state: Milwaukee, Wisconsin

Honorable William E. Duffin, U.S. Magistrate Judge

Printed name and title

## **AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Martin Keck, being first duly sworn, state the following is true and correct to the best of my knowledge and belief:

### **I. INTRODUCTION, BACKGROUND, TRAINING, AND EXPERIENCE**

1. I am currently employed as a Detective for the Wauwatosa Police Department. I have been employed as a law enforcement officer for over sixteen years. Since October 2018, I have been assigned as a federally deputized Task Force Officer (TFO) on the Federal Bureau of Investigation (FBI) Milwaukee Area Violent Crimes Task Force, a multi-jurisdictional law enforcement entity charged with investigating violations of federal law, including bank robberies, commercial robberies, armed motor vehicle robberies (carjackings), and other violent crime matters, defined under Title 18 of the United States Code. I have participated in the investigation of numerous violent crimes, including armed bank robberies, armed motor vehicle robberies, and armed commercial robbery investigations in violation of Title 18, United States Code, Sections 924(c), 1951, 1956, 1957, 2113, and 2, and other related offenses. I have been trained in a variety of investigative and legal matters, including the topics of Fourth Amendment searches, the drafting of search warrant affidavits, and probable cause. I have participated in criminal investigations, surveillance, search warrants, cellular telephone extractions, interviews, DNA collection, and debriefs of arrested subjects. As a result of this training and investigative experience, I have learned how and why violent actors typically conduct various aspects of their criminal activities.

2. I have conducted and/or assisted with investigations of violent crime violations in conjunction with agents and officers from other jurisdictions, and have received training from these agents and officers in conducting these investigations. I have also conducted and/or assisted with

investigations that have led to the arrest of persons for violations of law dealing with commercial robberies.

3. This affidavit is based upon my personal knowledge, training and experience, and on information reported to me by other federal, state, and local law enforcement officers during the course of their official duties, all of whom I believe to be truthful and reliable. This affidavit is also based upon my review of police reports, official records, citizen witnesses' statements, consent searches, recorded statements, law enforcement surveillance, surveillance video, court records, and public records which I consider to be reliable as set forth herein. The facts of this Affidavit are based upon information obtained from my investigation, as well as information I have received from other law enforcement officers.

4. Based on the investigation to date, I submit that there is probable cause to believe that Paul R. Banks III (DOB XX/XX/1994) and Russell D. Roquemore (DOB XX/XX/2002) conspired with one another to commit and committed a bank robbery of an ATM technician, in violation of Title 18, United States Code, Sections 2113(a) (Bank Robbery).

5. Because this affidavit is submitted for the limited purpose of obtaining a criminal complaint and arrest warrants, I have not included each and every fact known to me concerning this investigation. I have attempted to set forth only the facts I believe are pertinent to establishing the necessary foundation for the complaint and corresponding arrest warrants.

## **II. PROBABLE CAUSE**

6. On Friday, October 27, 2023, at approximately 2:11pm, Wauwatosa Police Officers were dispatched to the Wells Fargo Bank located at 2675 North Mayfair Road, Wauwatosa, WI for a report of a robbery. Upon arrival, officers learned an individual servicing the Wells Fargo Bank ATM was robbed by force. A total of \$170,650 U.S. currency was stolen during the robbery.

7. Wauwatosa Police Detective Jeremy Bronner spoke with the victim, identified as SRV. SRV stated that he is an employee of NCR Atleos and services ATMs. On October 27, 2023, at approximately 1:40pm, SRV arrived at the ATM located at the Wells Fargo Bank at 2675 North Mayfair Road to service the ATM. After being at the ATM for approximately thirty minutes, SRV observed two subjects walk towards him. One of the subjects pushed him backwards. The two subjects then grabbed two cassettes each (total of four cassettes) from the ATM and ran back to a white SUV parked near SRV's vehicle. The subjects then fled in the vehicle southbound on North Mayfair Road.

8. SRV described the two subjects as:

- a. Suspect 1 – Black male, unknown age, unknown height, thin build. He was wearing a light-colored long sleeve shirt, blue jean pants and gym shoes. The suspect's face was covered with a mask and he was wearing blue surgical gloves.
- b. Suspect 2 – Black male, unknown age, unknown height, thin build. He was wearing a light-colored long sleeve shirt, blue jean pants and gym shoes. The suspect's face was covered with a mask and he was wearing blue surgical gloves.

9. SRV described the vehicle the suspects fled in as a white Ford Bronco with Illinois plate.

10. SRV did not consent to being robbed.

11. Wauwatosa Police Detective Martin Keck is aware that video footage of the robbery was collected. The video shows two suspects wearing grey hooded sweatshirts, one with grey pants and one with black pants approach the ATM and take the cassettes out of the ATM. The suspects are masked and wearing gloves. The video collected depicts a white Ford Bronco Sport with black rims and black tinted windows as the suspect vehicle.

12. A search of the scene by Detectives revealed recovery of a driver's license for **Paul Roosevelt Banks III (M/B XX/XX/1994)** in the parking lot where the robbery occurred. The driver's license was located directly behind (to the west of) the victim's work vehicle. This is the location the suspects came from prior to the robbery and ran to after the robbery. The driver's license was in a bundle of US currency folded in half. Banks has a listed address of XXX Junell St., Houston, TX 77088.

13. Detective Keck conducted a record check of Banks. The records check revealed Banks is currently on federal probation and has a fully extraditable warrant for a probation violation through the United States Marshalls Service. He was placed on probation for robbery. Banks has a criminal history involving armed robberies including ATM robberies and pharmacy robberies.

14. Investigators conducted a FLOCK check in the area of the robbery. FLOCK is a software program that allows users to search for vehicles and license plates captured by cameras that are dispersed throughout the Milwaukee area. The software allows you to search for vehicles by license plate or run queries based off of vehicle color, make and style. Investigators located a white Ford Bronco Sport with black rims and tinted windows bearing a California license plate of 9AFZ537 traveling northbound on North Mayfair Road at West Bluemound Road on October 27, 2023 at 1:32pm. Still images of the FLOCK image were compared with images of the suspect auto at the robbery scene and all of the features of the vehicle were found to be a match.

15. Additionally, a search of the FLOCK system revealed that the Ford Bronco was in Houston, Texas as late as 9:14pm on Wednesday, October 25, 2023. Thus, the vehicle traveled from Texas to Wisconsin sometime after 9:14pm on October 25, 2023. On October 26, 2023 at 3:57pm, the vehicle was captured by a FLOCK camera in the City of West Allis.

16. Detective Keck conducted a records check of CA license plate 9AFZ537 and learned that the vehicle is registered to a 2021 Ford. The VIN of the vehicle is 3FMCR9B63MRB31756. The vehicle is registered to Hertz Vehicles, LLC – a rental car.

17. Following the robbery, investigators continued to search FLOCK and other license plate cameras throughout the United States and did not get any readings on the vehicle.

18. Wauwatosa Police Detective Nick Stahl reviewed DOT video cameras in the area of the robbery. He concluded the suspect vehicle likely turned westbound on West North Avenue at North Mayfair Road. This turn lane is not captured by cameras, but all of the likely escape routes were recorded by cameras. In viewing all of the likely escape routes, the suspect vehicle was not captured, leading to Detective Stahl's conclusion that the vehicle likely turned westbound on West North Avenue.

19. On November 1, 2023 at approximately 12:55pm, Detective Keck and Milwaukee County District Attorney's Office Investigator Steven Strasser checked the area to the west of North Mayfair Road and West North Avenue and discovered the 2021 Ford Bronco bearing CA registration plates of 9AFZ537 located in the parking lot of Normandy Village, in the 2500 block of North 124<sup>th</sup> Street, in the City of Wauwatosa, County of Milwaukee, State of Wisconsin. The Normandy Village parking lot is approximately sixteen blocks to the west and approximately two blocks to the south of where the robbery occurred.

20. The Ford Bronco was covered in snow, indicative of not traveling for at least the last day. The vehicle was backed into a parking spot. In plain view, detectives observed the passenger compartment was clean, but a water bottle was in the cup holder of the passenger's side front door. The Ford Bronco was seized and towed to the Wauwatosa Police Department's secure evidence garage.

21. On November 1, 2023, Detective Keck applied for and was granted a search warrant in Milwaukee County Circuit Court to forensically examine the recovered Ford Bronco that was used to commit the Robbery.

22. On November 2, 2023, Detective Bradley Isaacson removed the Electronic Control Unit (ECU) as trained from the Ford Bronco. Detective Isaacson used the digital forensic software Berla iVe tool to complete a logical acquisition from the module. Detective Isaacson analyzed the data from vehicle's infotainment and telematics' systems.

23. Detective Isaacson reviewed the Ford Bronco's tracklog which showed the vehicle was present in the Wells Fargo parking lot at the time of the Robbery. The vehicle's track log showed the vehicle departed the bank's parking lot and traveled southbound on North Mayfair Road. The vehicle turned westbound on West North Avenue and continued northbound on North 124<sup>th</sup> Street. The vehicle then parked at Normandy Village.

24. Detective Isaacson determined an iPhone with the friendly name of "Paul's iPhone" connected to the Ford Bronco at the following dates/times:

a. 10/26/2023

i. 4:06:04am

b. 10/27/2023.

i. 6:17:35am

ii. 7:01:13am

iii. 7:15:51am

iv. 12:58:07pm

v. 2:17:30pm

vi. 6:40:08pm

25. Detective Isaacson determined that “Paul’s iPhone” was disconnected from the vehicle at 2:17pm on October 27, 2023, while parked at Normandy Village, 2500 block of North 124<sup>th</sup> Street in the City of Wauwatosa. This information is consistent with the vehicle’s tracklog history and the ignition being turned off. This is the same location Detective Keck recovered the vehicle from.

26. With the use of the forensic tools, Berla iVe, Detective Isaacson identified “Paul’s iPhone’s” unique identifying number as A8FE9D66175D and a subscriber phone number of 713-658-5668. The service provider for the phone number is AT&T.

27. Detective Isaacson conducted additional analysis of the vehicle’s tracklog on October 26, 2023, and October 27, 2023. Detective Isaacson determined the vehicle was present at the Super 8 by Wyndham, 7601 118th Ave, Pleasant Prairie, WI on the evening hours on October 26, 2023, and the early morning hours on October 27, 2023.

28. Detective Keck made contact at the Super 8 on November 2, 2023 and was shown the Ford Bronco on surveillance video. Detective Keck learned the renter of the room associated with the Ford Bronco was a Russell D. Roquemore and that the vehicle was present at the Super 8 on October 26<sup>th</sup> and 27<sup>th</sup>, 2023. The hotel staff provided an address of 1718 Granger St, Houston, TX for Roquemore.

29. Detective Isaacson also discovered the occupants of the Ford Bronco used the gas station north of the Super 8. The gas station was identified as Mobile Gas Station, 7511 118<sup>th</sup> St, Pleasant Prairie, WI. Detective Keck obtained surveillance video from the gas station on November 2, 2023, and observed an individual exit the Ford Bronco and entered the store. Still images were captured of the black male subject.

30. Additionally, Detective Keck utilized a law enforcement tool Automated Facial Recognition (AFR). The gas station photographs were loaded into the program which yielded a



100% return identifying the subject as Russell D. Roquemore with a date of birth as XX/XX/2002.

Detective Keck confirmed the individual depicted in the video was Russell D. Roquemore.

31. Detective Isaacson reviewed “Paul’s iPhone” within the Berla iVe digital report which showed 251 contacts were captured when “Paul’s iPhone” was synced to the Ford Bronco.

32. Detective Isaacson located the contact name “Russ” with a cellphone number of **346-210-7043** within the 251 contacts.

33. Detective Isaacson also located another iPhone device that was connected to the Ford Bronco on October 26, 2023, at 9:06:33 am. Detective Isaacson identified the iPhone’s unique identifying number as 2CC2537EE908 and a subscriber phone number of **346-210-7043**. The service provider for the phone number is Verizon.

34. Detective Isaacson conducted an open search through the popular financial application “Cash App” and searched the phone number **346-210-7043** which showed the phone number is associated with the name Russell D. Roquemore (\$Kingruss6).

35. On November 2, 2023, Detective Isaacson drafted a search warrant to track the device associated with the phone number 713-658-5668. The warrant was authorized by the Milwaukee County Circuit Court. On November 3, 2023 Detective. Keck received historical records associated with the phone number 713-658-5668. Detective Keck found the following relevant to this investigation:

- a. The listed user of the device is “Paul R. Banks.”
- b. The cell site data associated with the phone number was consistent with moving with the Ford Bronco (compared with data obtained from the Berla iVe extraction), including being present in the area of the robbery at the time of the robbery as well as various locations investigators obtained video of the Ford Bronco and its occupants.

- c. The device was connected to cell sites in the area of Chicago O'Hare International Airport as late as 6:13am on October 28, 2023. The device was then connecting to cell sites in the area of George Bush International Airport at 8:23am on October 28, 2023.

36. On November 3, 2023, Detective Isaacson drafted a search warrant to track the device associated with the phone number 346-210-7043. The warrant was authorized by the Milwaukee County Circuit Court. On November 6, 2023, Detective Keck received historical records associated with the phone number 346-210-7043. Detective Keck found the following relevant to this investigation:

- a. The listed user of the device is "Russell D. Roquemore".
- b. The cell site data associated with the phone number was consistent with moving with the Ford Bronco (compared with data obtained from the Berla iVe extraction), including being present in the area of the robbery at the time of the robbery as well as various locations investigators obtained video of the Ford Bronco and its occupants.
- c. The device connected to cell sites in the area of Chicago O'Hare International Airport as late as 6:13am on October 28, 2023. The device was then connecting to cell sites in the area of George Bush International Airport at 8:23am on October 28, 2023.

37. On October 28, 2023, (day after robbery) the Verizon account with the phone number 346-210-7043 was changed to 832-596-8820. The subscriber remained Russell D. Roquemore.

38. FBI Special Agent Rienenrth informed Detective Keck that the AT&T account with the phone number 713-658-5668 was changed to 832-258-6943 on November 3, 2023.

39. Task Force Officer (TFO) Massari, who is employed as a United States Postal Inspector, followed up at various locations from the Ford Bronco's extraction report indicated the vehicle was at the Dick's Sporting Goods, located at 9899 76<sup>th</sup> Street, in the City of Kenosha, WI from 5:52pm to 6:02pm on October 26, 2023. TFO Massari obtained an image of the suspects entering the Dick's Sporting Goods. In the photo, the suspects are wearing what appears to be the same sweatshirt and pants that the suspects were wearing during the robbery. Detective Keck compared images of the suspects at Dick's with known images of Russell D. Roquemoire and Paul R. Banks. Detective Keck identified the people at Dick's to be Russell D. Roquemoire, (wearing the grey pants) and Paul R. Banks (wearing the black pants).

### **III. CONCLUSION**

40. Based on the investigation to date, I submit there is probable cause to believe that Paul R. Banks III (DOB XX/XX/1994) and Russell D. Roquemoire (DOB XX/XX/2002) conspired with one another to commit and committed a robbery of an ATM technician, in violation of Title 18, United States Code, Sections 2113(a) (Bank Robbery).